

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ESSAR STEEL ALGOMA, INC., et al.
Plaintiff,

v.

**SOUTHERN COAL SALES
CORPORATION**
Defendant.

Case No. 1:17-mc-00360-AT

**DEFENDANTS' NOTICE TO
TAKE VIDEOTAPED DEPOSITIONS**

PLEASE TAKE NOTICE in accordance with Rule 30 of the Federal Rules of Civil Procedure, counsel for the Defendants, James C. Justice Companies, Inc., James C. Justice Companies, LLC, Bluestone Industries, Inc., Bluestone Coal Corporation, Bluestone Mineral, Inc., Bluestone Energy Sales Corporation, A&G Coal Corporation, Tams Management Inc., Encore Leasing LLC, Bluestone Resources Inc., Justice Family Farms, LLC, 15 Corporation (collectively, the "New Defendants"), and Nevada Holdings (formerly Southern Coal Sales Corp.) ("SCSC" or "Southern Coal"), by and through counsel, will take the videotaped depositions of the following individuals, at the office of Thompson Hine LLP, 3900 Key Center, 127 Public Square, Cleveland, Ohio 44114 on the dates and times noted below:

<u>Deponent</u>	<u>Date</u>	<u>Time</u>
John M. Stark, CPA/ABV, CFF	March 3, 2020	9:00 a.m.
Shawn Galey	March 4, 2020	9:00 a.m.

The depositions will be taken before an officer authorized to administer oaths and videographer for all purposes permitted by the Federal Rules of Civil Procedure. The depositions shall continue from day to day until completed.

Respectfully submitted,

/s/ Richard A. Getty

RICHARD A. GETTY (admitted pro hac vice)

DANIELLE HARLAN (admitted pro hac vice)

And

MARCEL RADOMILE (admitted pro hac vice)

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CORPORATION, A&G COAL CORPORATION,
TAMS MANAGEMENT INC., ENCORE
LEASING LLC, BLUESTONE RESOURCES
INC., JUSTICE FAMILY FARMS, LLC AND
SOUTHERN COAL CORPORATION

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